IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appl. No.:	10/551,242	Confirmation No.:	4283
Applicant:	Mark Watson		
Filed:	07/24/2006		
TC/A.U.:	2617		
Examiner:	Issam Chakour		
Title:	Including A Hashed Service Identifier In A Paging Message For A Service Group Call		
Docket No.:	15975ID (BGN.0024US)		

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a Notice of Appeal.

It is respectfully submitted that the anticipation rejection of independent claims 1, 5 and 8 is in error.

Claim 1 recites a method of providing a service to wireless stations through a telecommunication network, the service being identified by a unique service identifier stored in the telecommunication network and in at least one subscriber station among the wireless stations, the method comprising:

- determining a paging identifier in the telecommunication network and at said subscriber station, by applying a hash function to a data string including at least part of the unique service identifier;
- associating said subscriber station with the determined paging identifier; and

- prior to transmitting information pertaining to the service over a broadcast channel, transmitting a paging message incorporating said paging identifier to the wireless stations.

The Office Action cited ¶ [0037], line 10, of Sinnarajah as purportedly disclosing "the service being identified by a unique service identifier." 3/4/2009 Office Action at 2. This passage of Sinnarajah refers to an HSBS (high-speed broadcast service) channel identifier (HSBS ID). The Response to Arguments section of the Final Office Action also referred to another identifier as purportedly constituting the "unique service identifier" of claim 1: BSR_ID mentioned in ¶ [0036], lines 5-6, of Sinnarajah. BSR_ID is a broadcast service reference identifier that is assigned each packet of a particular HSBS channel. BSR_ID is used to distinguish one HSBS channel from another. Sinnarajah, ¶ [0036].

The problem with identifying either the BSR_ID or HSBS ID as being the "unique service identifier" of claim 1 is that there is nothing in Sinnarajah that even remotely hints at applying a hash function to a data string that includes part of the BSR_ID or HSBS ID of Sinnarajah when determining a paging identifier. According to claim 1, a hash function is applied "to a data string including at least part of the unique service identifier."

Page 2 of the Final Office Action argued that ¶ [0060], lines 25-29, of Sinnarajah purportedly discloses the application of a hash function to a data string including at least part of the unique service identifier. Specifically, page 2 of the Final Office Action pointed to "IMSI" that is mentioned in this passage of Sinnarajah. Paragraph [0060] of Sinnarajah explains that its hashing function is used to determine a paging channel that a subscriber station monitors. *Id.*, ¶ [0060]. According to Sinnarajah, its hashing function accepts a number of entities to hash, including frequencies, paging channels, and the IMSI (international subscriber station identifier). Thus, it appears that the Final Office Action on page 2 is equating IMSI disclosed in ¶ [0060] of Sinnarajah with the "unique service identifier" of claim 1. However, this reading of Sinnarajah is inconsistent with the assertion elsewhere in the Final Office Action that either the BSR_ID or HSBS ID of Sinnarajah constitutes the unique service identifier of claim 1. It is clear that the IMSI identifies a subscriber, and does not constitute either the BSR_ID or HSBS ID. Even more fundamentally, the IMSI used to identify a subscriber does not identify a service, as recited in claim 1, and thus the Final Office Action has incorrectly argued that applying hashing to an input

that includes IMSI is equivalent to applying hashing to an input that includes at least a part of a unique service identifier that identifies a service.

Apparently recognizing the defect in the rejection, the Response to Arguments section of the Final Office Action further cited ¶ [0066], lines 9-10, of Sinnarajah as purportedly disclosing the application of a hash function to a data string including at least part of a unique service identifier. Paragraph [0066] of Sinnarajah states that a base station receives a broadcast service registration from a service station for a HSBS channel, and in response, the base station adds a corresponding HSBS channel identifier (HSBS ID) to a paging set. As further explained by Sinnarajah, when an incoming call is received for a subscriber station, the base station uses a logical-to-physical mapping to determine the frequency or frequencies corresponding to all HSBS channels having identifiers in the paging set. The base station then sends a paging message to the subscriber station on all such frequencies.

There is nothing in ¶ [0066] of Sinnarajah that even remotely hints at application of a hash function to a data string that includes at least part of either the HSBS ID or the BSR_ID equated by the Final Office Action with the "unique service identifier" of claim 1. What ¶ [0066] teaches is that a mapping is performed to determine a frequency or frequencies corresponding to all HSBS channels having identifiers in the paging set.

The Final Office Action further noted that ¶ [0060] of Sinnarajah states that the hash function is applied to a paging channel. Applying a hash function to a paging channel is not the same as applying a hash function to a data string that includes at least part of the unique service identifier, which was equated by the Office Action to the BSR_ID or HSBS ID.

Moreover, as recited in claim 1, the application of a hash function to a data string including at least part of the unique service identifier is performed for determining a paging identifier, which is then incorporated into a paging message transmitted to wireless stations. With respect to the "paging identifier" mentioned in claim 1, the Final Office Action cited claim 13 of Sinnarajah, which refers to determining frequencies on which to page the subscriber station in accordance with paging identifiers contained in the subscriber station paging set. However, there is absolutely no hint given anywhere in Sinnarajah that the paging identifiers contained in the subscriber station paging set is determined based on applying a hash function to a data string including part of the unique service identifier.

In view of the foregoing, it is clear that the subject matter of claim 1 is clearly not anticipated by Sinnarajah.

Independent claims 5 and 8 are similarly allowable over Sinnarajah.

Dependent claims are allowable for at least the same reasons as corresponding independent claims.

In view of the allowability of base claims, the obviousness rejections of dependent claims over Sinnarajah and other references (including Aune and Corriveau) have been overcome.

Withdrawal of the Final Rejection and allowance of all claims is respectfully requested.

In view of the foregoing, it is respectfully requested that the final rejections of the claims be withdrawn. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 14-1315 (15975ID).

Respectfully submitted,

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